

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HUGHES RIVER FM, LLC,  
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,  
a Cayman Islands corporation,  
YU JIANJUN, an individual,  
SEAMAN YU, an individual,  
XIAOYU CHEN, an individual,  
LI HAIBO, an individual,  
and TENCENT MUSIC ENTERTAINMENT  
GROUP, INC., a Cayman Islands  
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**DEFENDANTS' JOINT MOTION FOR ENTRY OF CONFIDENTIALITY ORDER**

Defendants Ximalaya, Inc., Tencent Music Entertainment Group,<sup>1</sup> Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [*sic*] Chen, and Li Haibo (the “**Defendants**”) respectfully request that the Court enter the attached confidentiality order (“**Confidentiality Order**”) to govern the exchange of information alleged to be commercially sensitive in this case. Defendants have met and conferred with Plaintiff who has objected and refused to agree to the proposed Confidentiality Order without extensive further revisions. In support of their motion, the Defendants state:

1. The Defendants to this case anticipate that prior to and during discovery they will exchange documents, answers to interrogatories, and deposition testimony that will reflect or

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<sup>1</sup> Plaintiff has incorrectly referred to Tencent Music Entertainment Group as “Tencent Music Entertainment Group, **Inc.**” (emphasis added).

reveal what is alleged to be confidential business information. As a result, they have agreed on the terms of a protective order.

2. A copy of the Agreed Confidentiality Order, signed by all of Defendants' counsel of record, is attached as **Exhibit 1**.

3. Defendants believe that the Agreed Confidentiality Order fully comports with Federal Rule of Civil Procedure 26 and is appropriate and suitable for this case. The Defendants used the form order available on the Court's website and made narrow, but appropriate, changes to tailor the submitted order to the circumstances of this case. As shown, many changes relate to this order being entered prior to discovery. Those changes are made in redline in the attached **Exhibit 2**.

4. By entering into, agreeing to, or submitting this Joint Motion and the Agreed Confidentiality Order, the Defendants are in no way agreeing, acknowledging, or conceding (or prejudicing, limiting, waiving or otherwise foregoing any defense, argument, or assertion disputing) that: (i) this Court has jurisdiction over any of the Defendants; (ii) this Court is a valid and appropriate forum for this matter or the Parties' dispute; or (iii) any Party is entitled to discovery relating to any subject matter or legal or factual issue.

Dated: August 27, 2025

RESPECTFULLY SUBMITTED,

By: /s/ Vincent Filardo, Jr.

Vincent Filardo, Jr. (*pro hac vice*)

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*Counsel for Defendant Ximalaya, Inc.*

RESPECTFULLY SUBMITTED,

/s/ Todd Gale

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RESPECTFULLY SUBMITTED,

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*Counsel for Defendants Yu Jianjun, Seaman Yu  
(duplicate of Yu Jianjun), Xiaoyu [sic] Chen, and  
Li Haibo*

### **CERTIFICATE OF SERVICE**

I, Vincent Filardo, Jr., certify that on August 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all registered users.

Dated: August 27, 2025

By: /s/ Vincent Filardo, Jr.